

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the Statements of Legal and Factual Basis dated May 28, 2003, April 12, 2004,
December 6, 2005 and November 19, 2007

Dominion Generation
5000 Dominion Boulevard, Glen Allen, Virginia
Permit No. SCRO30859

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion Generation has applied for an administrative amendment of the Title V Operating Permit for its Altavista facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____

Patrick Corbett
(434) 582-6230

Date: DRAFT

Air Permit Manager: _____

David J. Brown

Date: _____

Regional Director: _____

Thomas L. Henderson

Date: _____

FACILITY INFORMATION

Permittee

Dominion Generation
5000 Dominion Boulevard
Glen Allen, VA 23060

Facility

Altavista Power Station
104 Wood Lane
Altavista, VA 24517

County-Plant Identification Number: 51- 031-00156

SOURCE DESCRIPTION

Dominion-Altavista Power Station (APS) manufactures electricity and is covered by North American Industrial Classification System code 221112- Fossil Fuel Electric Power Generation. The power station operates two, 382.5 MM Btu/hr coal-fired stoker boilers with associated coal, wood, lime, ash, and fuel oil handling systems.

COMPLIANCE STATUS

APS is inspected every other year. The last full compliance evaluation was completed on September 7, 2006 and the facility was not found to be in violation of any state or federal applicable requirements during that time.

ADMINISTRATIVE AMENDMENT PERMIT INFORMATION

APS has proposed a modification to their facility to allow combustion of wood chips in the fuel bed and removal of the wood dust throughput limitation (former Condition 19 of NSR permit dated 11/5/2003). APS has also requested an unrelated change to a 30-day rolling average CO limit contained in their NSR permit.

Both projects contravene limits contained in the facility's Title V permit. Therefore, the Title V permit must be changed before APS can implement these changes. Per 9 VAC 5-80-200.A.5, the Title V permit can be administratively amended if the new source review (NSR) permit underwent public participation requirements "substantially equivalent" to the Title V process (9 VAC 5-80-270 and 290). The NSR permit and this Title V change are undergoing concurrent review utilizing the most restrictive of the required public participation processes (i.e. all requirements of Title V public participation are met). The NSR permit also contains compliance requirements which meet 9 VAC 5-80-110. Considering this information, the change to the Title V permit meets the criteria for an administrative amendment. For an in-depth review of these NSR actions, see the accompanying DRAFT NSR Engineering Analysis.

Throughout the permit, regulatory citations and permit conditions were updated where appropriate.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

There are no physical changes to APS' existing emissions units. With issuance of this permit, APS will have the ability to burn wood chips and the ability to maximize wood dust combustion in the primary coal boilers (001 and 002). The facility will also add a wood chip handling system (025) rated at 500 TPH.

EMISSIONS INVENTORY

The 2006 emissions update has been reviewed for accuracy.

EMISSION UNIT APPLICABLE REQUIREMENTS

Section III – Primary Boiler Requirements

This section contains the conditions related to the new 30-day rolling average CO limitation on the primary coal boilers (001 and 002), including CEMS requirements. Former Condition 19 of the NSR permit dated 11/5/2003 (i.e., the wood dust throughput limitation) has been removed and wood chips have been added as an approved fuel.

For general correctness and clarity, Condition III.A.4 has been updated to reflect the sulfur requirements (Conditions III.A.8 and 9) are more stringent than the referenced ASTM specifications.

Section IV – Auxiliary Boiler Requirements

For general correctness and clarity, Condition IV.A.2 has been updated to reflect the sulfur requirements (Conditions IV.A.3 and 4) are more stringent than the referenced ASTM specifications.

Section VI – Diesel Engine Requirements

For general correctness and clarity, Condition VI.A.2 has been updated to reflect the sulfur requirements (Conditions VI.A.3 and 4) are more stringent than the referenced ASTM specifications.

Section VII – Material Handling Requirements

Condition VII.A.10 was added to control fugitive emissions from the new wood chip handling equipment. Condition VII.A.13 was changed to reflect the wood dust and wood chip handling system as subject to the emission limitations and the cross-referenced conditions were corrected.

Condition VII.B.1 was updated to clarify the intent of the requirement. The wording “15-second” was added before “observation” to ensure any single Method 9 observation greater than the stated percentage would trigger a 60 minute Method 9.

In accordance with current practice, the table of testing protocols in Section VII.D has been removed as it is unnecessary and misleading.

Section IX – Facility Wide Requirements

This section was reformatted to include two additional requirements. Condition IX.A.2 is a new condition from the minor NSR approval for this project. Condition IX.A.3 reflects the applicable requirement of 9 VAC 5-80-1785 concerning projects at a major stationary source (PSD).

GENERAL CONDITIONS

There are no changes to the General Conditions resulting from this administrative amendment.

FUTURE APPLICABLE REQUIREMENTS

There are no changes in future applicable requirements due to this administrative amendment. The first CAIR requirements become effective on January 1, 2009.

INAPPLICABLE REQUIREMENTS

There is no change in the inapplicable requirements due to this administrative amendment.

COMPLIANCE PLAN

Not applicable

INSIGNIFICANT EMISSION UNITS

There is no change to the insignificant units due to this administrative amendment.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

Generally, administrative amendments do not require any public participation. However, this action is proceeding concurrently through the most restrictive public participation requirements from the applicable programs (minor NSR, major NSR amendment, Title V). Therefore, this administrative amendment is subject to a 45-day public comment period, a public hearing, affected state review (North Carolina), and a 45-day EPA review period. Furthermore, the 45-day EPA review period is running concurrently with the 45-day public comment period.